



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

MARY JANE ANDERSON
Assistant Corporation Counsel
Phone.: (212) 356-2415
Fax: (212) 356-3509
maanders@law.nyc.gov

March 7, 2024

VIA E.C.F.

Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jason Goodman v. the City of New York, et al.,
23 Civ. 9648 (JGLC) (GWG)

Your Honor:

I am an Assistant Corporation Counsel of the New York City Law Department and the attorney representing defendant the City of New York and Officer Castro in this matter. The City writes to respectfully request a brief, additional one week extension of time to respond to the operative pleading in this matter from March 11, 2024, to March 18, 2024, and to respectfully request that the Court *sua sponte* extend the time for the individual defendants to respond by the same. This is the City's fourth request for such an extension. Plaintiff does not consent to the instant request. Plaintiff stated that he is "very angry" and he believed that we would settle this matter, not move to dismiss the case. He stated that the Defendants are delaying the case. Defendant Sharp consents to the instant request, and Defendant "X Corporation" does not oppose the request.

By way of background, on January 19, 2024, we asked the Court for a forty-five day extension of time to respond to the Complaint. (ECF No. 42). That request was denied, as Plaintiff's position was not noted in the letter. (ECF No. 43). On February 5, 2024, we renewed that motion, noting that Plaintiff consented to the request, and it was granted. (ECF Nos. 50, 51). On February 29, 2024, we requested an additional week to respond to the Complaint. (ECF No. 62). On March 1, 2024, that request was granted. (ECF No. 63).

Last week, while in the process of writing the motion, Plaintiff sent us video footage of the underlying incident. We are discussing internally the ways that the footage may affect our motion, and as such, require additional time to finalize that motion.¹

I thank the Court for its time and consideration herein.

Respectfully submitted,

Mary Jane Anderson /s/

Mary Jane Anderson
Assistant Corporation Counsel
Special Federal Litigation Division

Cc: VIA FIRST-CLASS MAIL & EMAIL
Jason Goodman
252 7th Avenue
Apt. 6S
New York, NY 10001
truth@crowdsourcethetruth.org

VIA ECF
Counsel of Record

¹ While we do not yet represent all of the individual defendants, we intend to finalize representation by the time the motion is filed. Accordingly, since defendants Ebrahim, Garcia, and Caruso are not yet represented by this office, we request that the Court *sua sponte* extend the time for their motion to dismiss to be submitted.